

# EXHIBIT D

2 UNITED STATES DISTRICT COURT  
3 FOR THE DISTRICT OF CONNECTICUT

4 -----X

5 BROCK LESNAR,

Civil Action #  
3:05CV221 (CFD)

6 Plaintiff,

7 v.

8 WORLD WRESTLING ENTERTAINMENT, INC.,

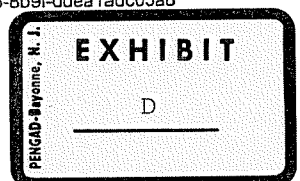
9 Defendant.

10 -----X

11  
12 Day, Berry & Howard, LLP  
One Canterbury Green  
13 Stamford, Connecticut 06901  
14 November 21, 2005  
10:04 a.m.

15  
16  
17 VIDEOTAPED DEPOSITION OF PLAINTIFF, BROCK LESNAR,  
18 pursuant to Notice, taken at the above place, date  
19 and time, before Lori Deskin, a Notary Public within  
20 and for the State of Connecticut.

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22  
23  
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25



<p style="text-align: right;">Page 2</p> <p>2 APPEARANCES:</p> <p>3</p> <p>4 DISERIO, MARTIN, O'CONNOR &amp; CASTIGLIONI, LLP</p> <p>5 Attorneys for Plaintiff</p> <p>6 One Atlantic Street</p> <p>7 Stamford, Connecticut 06901</p> <p>8 BY: SCOTT S. CENTRELLA, ESQ.</p> <p>9</p> <p>10 KIRKPATRICK &amp; LOCKHART NICHOLSON GRAHAM, LLP</p> <p>11 Attorneys for Defendant</p> <p>12 535 Smithfield Street</p> <p>13 Pittsburgh, Pennsylvania 15222-2312</p> <p>14 BY: JERRY MCDEVITT, ESQ.</p> <p>15</p> <p>16 DAY, BERRY &amp; HOWARD, LLP</p> <p>17 Attorneys for Defendant</p> <p>18 One Canterbury Green</p> <p>19 Stamford, Connecticut 06901</p> <p>20 BY: DANIEL L. SCHWARTZ, ESQ.</p> <p>21</p> <p>22 ALSO PRESENT:</p> <p>23 DON DALCIELO, Videographer</p> <p>24 AMANDA KERNAN: Paralegal, Kirkpatrick &amp; Lockhart</p> <p>25 Nicholson Graham, LLP</p>	<p style="text-align: right;">Page 4</p> <p>1 Brock Lesnar</p> <p>2 VIDEOGRAPHER: This is the video</p> <p>3 operator speaking, Don DalCielo, of LegaLink</p> <p>4 of New York City. Today's date is November</p> <p>5 21, 2005. The time is 10:04 a.m. We're here</p> <p>6 at the offices of Day, Berry &amp; Howard,</p> <p>7 located at One Canterbury Green in Stamford,</p> <p>8 Connecticut.</p> <p>9 We're here to take the videotaped</p> <p>10 deposition of Mr. Brock Lesnar in the matter</p> <p>11 of Brock Lesnar versus World Wrestling</p> <p>12 Entertainment, Incorporated. This is in the</p> <p>13 United States District Court, the District of</p> <p>14 Connecticut, Civil Action 305CV221.</p> <p>15 I'll ask counsel at this time to please</p> <p>16 voice identify yourself and state who you</p> <p>17 represent.</p> <p>18 MR. CENTRELLA: I represent -- the</p> <p>19 name's Scott Centrella, law firm of Diserio,</p> <p>20 Martin, O'Connor &amp; Castiglioni, representing</p> <p>21 the plaintiff, Brock Lesnar.</p> <p>22 MR. MCDEVITT: I'm Jerry McDevitt. I</p> <p>23 represent World Wrestling Entertainment.</p> <p>24 MS. KERNAN: I'm Mandy Kernan,</p> <p>25 paralegal.</p>
<p style="text-align: right;">Page 3</p> <p>2</p> <p>3 STIPULATIONS:</p> <p>4</p> <p>5 IT IS HEREBY STIPULATED AND AGREED by and</p> <p>6 between the attorneys for the respective parties</p> <p>7 hereto, that this examination may be sworn to before</p> <p>8 any Notary Public.</p> <p>9</p> <p>10 IT IS FURTHER STIPULATED AND AGREED, that</p> <p>11 the filing and certification of the said deposition</p> <p>12 shall be waived.</p> <p>13</p> <p>14 IT IS FURTHER STIPULATED AND AGREED, that</p> <p>15 all objections to questions, except as to the form</p> <p>16 of the question shall be reserved for the time of</p> <p>17 trial.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 Brock Lesnar</p> <p>2 MR. SCHWARTZ: I'm Daniel Schwartz from</p> <p>3 Day, Berry &amp; Howard representing World</p> <p>4 Wrestling Entertainment.</p> <p>5 VIDEOGRAPHER: Will the court reporter</p> <p>6 please swear in the witness?</p> <p>7 BROCK LESNAR, a Plaintiff herein, having been first</p> <p>8 duly sworn by Lori Deskin, a Notary Public for the</p> <p>9 State of Connecticut, was examined and testified as</p> <p>10 follows:</p> <p>11 COURT REPORTER: Would you state your</p> <p>12 name for the record, please?</p> <p>13 THE WITNESS: First name, Brock; middle</p> <p>14 name, Edward, last name, Lesnar.</p> <p>15 COURT REPORTER: And your address,</p> <p>16 please?</p> <p>17 THE WITNESS: 2324 Copeland Road, Maple</p> <p>18 Plain, Minnesota 55359.</p> <p>19 COURT REPORTER: Is that Copeland,</p> <p>20 C-O-P-E-L-A-N-D?</p> <p>21 THE WITNESS: Yes, ma'am.</p> <p>22 EXAMINATION BY MR. MCDEVITT:</p> <p>23 Q. Good morning, Mr. Lesnar.</p> <p>24 A. Good day.</p> <p>25 Q. I know she asked it, but would you again</p>

2 (Pages 2 to 5)

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<p style="text-align: right;">Page 26</p> <p>1 Brock Lesnar</p> <p>2 A. He's not my agent. He's my attorney.</p> <p>3 Q. Did you send it to him?</p> <p>4 A. Um, Yes.</p> <p>5 Q. So he had a chance to read it before you</p> <p>6 signed it too, right?</p> <p>7 A. Yes, he did.</p> <p>8 Q. And you had a chance to receive legal</p> <p>9 counsel before you signed the settlement</p> <p>10 agreement?</p> <p>11 A. Well, yes and no. I was living in</p> <p>12 Phoenix, living out of a hotel, training for</p> <p>13 football. Didn't have really a contact with</p> <p>14 Mr. Olsen because I was training all day long.</p> <p>15 And he sent me a letter back to the</p> <p>16 hotel, which I had moved out of. And then all of</p> <p>17 a sudden a phone call. I received a phone call</p> <p>18 stating that I need to come to the arena to sign</p> <p>19 the release, which I knew I was probably going to</p> <p>20 sign anyway, so I went down there and just signed</p> <p>21 it.</p> <p>22 Q. Did you own a cell phone then?</p> <p>23 A. Did I own one?</p> <p>24 Q. Yep.</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 28</p> <p>1 Brock Lesnar</p> <p>2 5/16/00, was marked for identification as of</p> <p>3 this date.)</p> <p>4 Q. Mr. Lesnar, let me show you what has</p> <p>5 been marked as Exhibit 1.</p> <p>6 MR. MCDEVITT: And throughout I'll give</p> <p>7 you a copy of whatever I'm showing him.</p> <p>8 MR. CENTRELLA: That's great, that's</p> <p>9 fine.</p> <p>10 Q. Take a minute and take a look at the</p> <p>11 document and tell me when you've finished your</p> <p>12 review, Mr. Lesnar.</p> <p>13 Have you finished your review sir?</p> <p>14 A. Yes.</p> <p>15 Q. Do you recognize this as a letter sent</p> <p>16 by Mr. Olsen to WWE?</p> <p>17 A. Looks to me.</p> <p>18 Q. And it indicates you got a copy of this?</p> <p>19 A. Do I have a copy?</p> <p>20 Q. No, sir. On the second page it</p> <p>21 indicates you received a copy of it; is that</p> <p>22 correct?</p> <p>23 A. Um, I believe so.</p> <p>24 Q. I take it before this letter was sent</p> <p>25 you had a meeting in Stamford with Mr. McMahon?</p>
<p style="text-align: right;">Page 27</p> <p>1 Brock Lesnar</p> <p>2 Q. Is there any reason you couldn't have</p> <p>3 picked up the cell phone and called Mr. Olsen to</p> <p>4 ask him what his view was of the settlement</p> <p>5 agreement?</p> <p>6 A. I trained eight, nine hours a day.</p> <p>7 Q. Which leaves what, 14?</p> <p>8 A. How many hours do you spend during the</p> <p>9 nighttime at your office?</p> <p>10 Q. So you had 14 hours each day to call</p> <p>11 Mr. Olsen. Are you testifying you never called</p> <p>12 Mr. Olsen to ask him about the document that you</p> <p>13 were about to sign, Mr. Lesnar?</p> <p>14 A. I spoke to him one time when he received</p> <p>15 the document. He said, This doesn't look good,</p> <p>16 let me get back to you.</p> <p>17 And that was basically it. He said he</p> <p>18 would get back to me.</p> <p>19 Q. Have you been honest with all your</p> <p>20 dealings with the WWE, Mr. Lesnar?</p> <p>21 A. Yes.</p> <p>22 Q. Let's go through some of the documents,</p> <p>23 if we could.</p> <p>24 (Defendant's Exhibit 1, Letter from Mr.</p> <p>25 Olsen to World Wrestling Entertainment, dated</p>	<p style="text-align: right;">Page 29</p> <p>1 Brock Lesnar</p> <p>2 A. Yes.</p> <p>3 Q. All right. Did you authorize Mr. Olsen</p> <p>4 to send this letter on your behalf?</p> <p>5 A. Yes.</p> <p>6 Q. Do you see in the CC line it says,</p> <p>7 "Barry Bloom"?</p> <p>8 A. Yeah.</p> <p>9 Q. Who's Barry Bloom?</p> <p>10 A. Um, he, I guess, would qualify as an</p> <p>11 agent.</p> <p>12 Q. All right. Is that sort of like a</p> <p>13 Hollywood agent, you mean?</p> <p>14 A. As a -- wrestling, Hollywood.</p> <p>15 Q. How did you get hooked up with</p> <p>16 Mr. Bloom?</p> <p>17 A. I wonder that myself. I'd really like</p> <p>18 to find out who.</p> <p>19 Q. All right. Did Mr. Olsen recommend him?</p> <p>20 A. I don't recall who. I guess, you know</p> <p>21 I've met -- at this time in my life I was out of</p> <p>22 college, young kid.</p> <p>23 Q. Did Mr. Olsen ever tell you whether he</p> <p>24 had an existing relationship with Mr. Bloom?</p> <p>25 A. I think he did, yeah. I assumed that he</p>

8 (Pages 26 to 29)

<p style="text-align: right;">Page 126</p> <p>1 Brock Lesnar</p> <p>2 correspondence I think pertaining to it.</p> <p>3 That's the only thing we have.</p> <p>4 And again, I didn't believe it's within</p> <p>5 the scope of the judge's order, and I don't.</p> <p>6 MR. MCDEVITT: All right.</p> <p>7 Q. Mr. Lesnar, turning to, going back to,</p> <p>8 if I can, to Paragraph 4A of the settlement</p> <p>9 agreement. And let me turn your attention to the</p> <p>10 second sentence that begins with "Accordingly".</p> <p>11 Are you with me? Do you see that, "Accordingly,</p> <p>12 Lesnar hereby covenants and agrees"?</p> <p>13 A. No.</p> <p>14 MR. CENTRELLA: 4A.</p> <p>15 A. "Obligation Not to Compete"?</p> <p>16 MR. CENTRELLA: Right. Going down about</p> <p>17 four lines down.</p> <p>18 Q. The second sentence that begins with</p> <p>19 "Accordingly".</p> <p>20 A. Okay.</p> <p>21 Q. Take a minute and look at that sentence</p> <p>22 and tell me when you're done with it.</p> <p>23 A. Tell me what I what?</p> <p>24 Q. Tell me when you're done reading that</p> <p>25 sentence?</p>	<p style="text-align: right;">Page 128</p> <p>1 Brock Lesnar</p> <p>2 I -- probably not, because I wasn't really</p> <p>3 concerned. I was just disappointed and I think I</p> <p>4 just went hunting for a month or two.</p> <p>5 Q. All right. I'm sorry, go ahead.</p> <p>6 A. And then when I decided that maybe I</p> <p>7 didn't make the right decision or whatever,</p> <p>8 because I had failed at football -- I mean, I</p> <p>9 don't know if I really failed or not, by making</p> <p>10 the team, yeah, but I'm glad I did it, so.</p> <p>11 But I didn't -- I don't recall when I</p> <p>12 looked, looked at this. I didn't even really -- I</p> <p>13 mean, I called Dave and I said, you know, what can</p> <p>14 I do and what can't I do? Well, nothing, he says.</p> <p>15 So that's when I decided when I had the</p> <p>16 open door policy with the WWE, I'd call them back</p> <p>17 and see if I could come back to work.</p> <p>18 Q. And was it around the time you had the</p> <p>19 conversation you just described with Mr. Olsen</p> <p>20 that you read Paragraph 4A and the sentence that</p> <p>21 we've talked about?</p> <p>22 A. I didn't read it.</p> <p>23 Q. But you understood what it effectively</p> <p>24 did?</p> <p>25 A. No. I just had Mr. Olsen to see what I</p>
<p style="text-align: right;">Page 127</p> <p>1 Brock Lesnar</p> <p>2 A. Okay.</p> <p>3 Q. When did you first become aware of that</p> <p>4 provision of your contract?</p> <p>5 A. When my football career was over.</p> <p>6 Q. Do you recall when that would have been?</p> <p>7 A. Last fall sometime.</p> <p>8 Q. I'm sorry, I didn't mean to interrupt</p> <p>9 you. Are you done? It would have been before the</p> <p>10 start of the regular NFL season last year?</p> <p>11 A. It would have been after probably, after</p> <p>12 I didn't make the team.</p> <p>13 Q. Correct me if I'm wrong, but you were</p> <p>14 cut in training camp before the regular season</p> <p>15 roster?</p> <p>16 A. Yeah, I was cut the last cut.</p> <p>17 Q. So was your career over before the first</p> <p>18 regular season game of last year?</p> <p>19 A. Yeah.</p> <p>20 Q. So it would have been over before</p> <p>21 September of 2004?</p> <p>22 A. Probably so.</p> <p>23 Q. And that is when you then became aware</p> <p>24 of this provision?</p> <p>25 A. I don't recall. I think I -- I think</p>	<p style="text-align: right;">Page 129</p> <p>1 Brock Lesnar</p> <p>2 could do and he said, You can't do anything, you</p> <p>3 can only going back to work for the WWE.</p> <p>4 Q. And what did you say?</p> <p>5 A. And I said, Well, okay. Let's see if I</p> <p>6 can go back to work. I'll try to get a hold of</p> <p>7 somebody.</p> <p>8 Q. And what did you do then?</p> <p>9 A. I made phone calls.</p> <p>10 Q. Who did you call?</p> <p>11 A. Gerry Brisco. Called Vince probably</p> <p>12 four or five times. Maybe Shane a couple of</p> <p>13 times.</p> <p>14 Q. All right. And did you have an offer to</p> <p>15 go to NFL Europe?</p> <p>16 A. Yeah, but I thought maybe that I would</p> <p>17 go back to WWE.</p> <p>18 Q. What did you do with the offer from NFL</p> <p>19 Europe?</p> <p>20 A. Nothing with it.</p> <p>21 Q. Did you turn it down?</p> <p>22 A. No, I never responded.</p> <p>23 Q. What was the offer?</p> <p>24 A. To go live in Europe for 16,000 dollars</p> <p>25 for four months.</p>

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<p style="text-align: right;">Page 138</p> <p>1 Brock Lesnar</p> <p>2 with respect to this specific document, where he's</p> <p>3 referring to terms for your possible return to the</p> <p>4 WWE --</p> <p>5 A. This letter was sent out I think on the</p> <p>6 30th of September?</p> <p>7 Q. In or around, yeah.</p> <p>8 A. Yes. I was -- I wasn't at home during</p> <p>9 that time. I think I had a phone conversation</p> <p>10 with him probably. And if he were to send</p> <p>11 something out I had him read the letters to me</p> <p>12 before. Like, if I wasn't going to be home he'd</p> <p>13 briefly read them and I'd be, like, Okay.</p> <p>14 Q. All right. Did he briefly read this</p> <p>15 letter to you before he sent it out?</p> <p>16 A. I don't recall.</p> <p>17 Q. But that was your modus operandi, he</p> <p>18 would usually read them to you at least?</p> <p>19 A. Sometimes he would. Sometimes he'd only</p> <p>20 ask me if I received them or not.</p> <p>21 Q. Well, with respect to this particular</p> <p>22 one, do you recall --</p> <p>23 A. I don't recall, no.</p> <p>24 Q. This is kind of an important letter,</p> <p>25 isn't it, to you?</p>	<p style="text-align: right;">Page 140</p> <p>1 Brock Lesnar</p> <p>2 your mind, did you, about what sports</p> <p>3 entertainment meant when he wrote that letter to</p> <p>4 the WWE?</p> <p>5 A. No.</p> <p>6 Q. And then he goes on to say, with that</p> <p>7 said, he wanted to make it clear that you weren't</p> <p>8 looking to return to the travel schedule of an</p> <p>9 everyday WWE performer. And then he proposes what</p> <p>10 he calls Discussion Alternative number 1.</p> <p>11 Do you see that? On page 1, Discussion</p> <p>12 Alternative number 1?</p> <p>13 A. Yeah.</p> <p>14 Q. And in that he indicates that during</p> <p>15 your absence from the WWE he says, quote, "We have</p> <p>16 been approached by various Japanese promoters who</p> <p>17 have asked Brock to appear in shoot fighting,</p> <p>18 ultimate fighting and other similar events on a</p> <p>19 one-time basis and for substantial sums of money."</p> <p>20 Do you see that?</p> <p>21 A. Yep.</p> <p>22 Q. Who were the various Japanese promoters</p> <p>23 being referred to there?</p> <p>24 A. I have no idea.</p> <p>25 Q. Did you know at the time this letter was</p>
<p style="text-align: right;">Page 139</p> <p>1 Brock Lesnar</p> <p>2 A. Well, it was either yes or no. I mean,</p> <p>3 if they want to take me back or they don't want to</p> <p>4 take me back. Or if they don't want to, then can</p> <p>5 we work out some sort of other deal, you know, by</p> <p>6 leasing me out or doing something, something in</p> <p>7 which that I can make some money, make some</p> <p>8 revenue.</p> <p>9 Q. Let's -- we'll come back to that. Let's</p> <p>10 focus in on the first paragraph of this document,</p> <p>11 last sentence there, where Mr. Olsen says, "Having</p> <p>12 given the NFL a shot, Brock is now ready to return</p> <p>13 to what he does best - sports entertainment."</p> <p>14 Do you see that?</p> <p>15 A. Yeah.</p> <p>16 Q. What do you understand that sentence to</p> <p>17 mean?</p> <p>18 A. That I left the NFL and would like to</p> <p>19 get back into wrestling.</p> <p>20 Q. Do you regard sports entertainment as</p> <p>21 synonymous with wrestling?</p> <p>22 A. I don't, no. But obviously maybe when</p> <p>23 you're talking to the WWE maybe he -- I'm just</p> <p>24 going to leave it at no.</p> <p>25 Q. But you didn't have any ambiguity in</p>	<p style="text-align: right;">Page 141</p> <p>1 Brock Lesnar</p> <p>2 written?</p> <p>3 A. I think it's all fictional stuff.</p> <p>4 Q. What's fictional stuff?</p> <p>5 A. Maybe there was -- maybe there was some</p> <p>6 discussions of them, and maybe I said to David</p> <p>7 that I've heard that the Japanese are interested</p> <p>8 in me. So, I mean, this is all probably something</p> <p>9 to add in to the letter where that there's other</p> <p>10 interests.</p> <p>11 Q. Well, he says we. Who's the we? "We</p> <p>12 have been approached". Who's the we?</p> <p>13 A. I don't know, you'll have to ask him.</p> <p>14 Q. Well, you weren't approached by various</p> <p>15 Japanese promoters, were you?</p> <p>16 A. No.</p> <p>17 Q. In fact, I think you indicated you were</p> <p>18 never approached. I think you were aware of one</p> <p>19 offer from K-1 that was received by Brad, right?</p> <p>20 A. Yeah.</p> <p>21 Q. And no others; is that right?</p> <p>22 A. Yeah.</p> <p>23 Q. And yet, he's saying here that you've</p> <p>24 been approached by various Japanese promoters who</p> <p>25 had asked you to appear in shoot fighting,</p>

36 (Pages 138 to 141)

<p style="text-align: right;">Page 254</p> <p>1 Brock Lesnar</p> <p>2 A. One.</p> <p>3 Q. And was that for the appearance you made</p> <p>4 at the October 8th show?</p> <p>5 A. Yeah.</p> <p>6 Q. You don't doubt or debate that was an</p> <p>7 appearance, do you?</p> <p>8 A. That was a wrestling match.</p> <p>9 Q. And that was an appearance within the</p> <p>10 meaning of the settlement agreement?</p> <p>11 A. Yep.</p> <p>12 Q. Do you agree with that?</p> <p>13 A. Yep.</p> <p>14 (Defendant's Exhibit 28, E-mail from Mr.</p> <p>15 Centrella to Mr. McDevitt dated 8/2/05, was</p> <p>16 marked for identification as of this date.)</p> <p>17 Q. Let me show you what's been marked</p> <p>18 Exhibit 28, Mr. Lesnar, which is an e-mail from</p> <p>19 counsel, Mr. Centrella, sent to me on August 2,</p> <p>20 2005. Have you ever seen that e-mail before?</p> <p>21 Have you ever seen that e-mail before?</p> <p>22 A. No.</p> <p>23 Q. Were you aware that it was sent?</p> <p>24 A. No.</p> <p>25 Q. Did you call Mr. Laurenitus at the WWE</p>	<p style="text-align: right;">Page 256</p> <p>1 Brock Lesnar</p> <p>2 What's that? And I said, Well, I don't think I'm</p> <p>3 going to take the -- take the job.</p> <p>4 And he goes, What's the matter? You</p> <p>5 know, Is there something I can do? What's going</p> <p>6 on? And I said, I just said, you know, that I --</p> <p>7 I just don't think that I can work for</p> <p>8 Mr. McMahon. I said that I had mixed feelings</p> <p>9 leaving the meeting and I just don't think that I</p> <p>10 would enjoy working for him. And I said tell him</p> <p>11 thanks. I said thanks for the years I did work</p> <p>12 for him, but this time I'm just going to have to</p> <p>13 say no.</p> <p>14 Q. Anything else that you said?</p> <p>15 A. That's all I recall.</p> <p>16 Q. Did you tell him that you just wanted to</p> <p>17 hunt and fish?</p> <p>18 A. Did I tell Johnny that?</p> <p>19 Q. Yeah.</p> <p>20 A. I don't recall. He asked maybe what I</p> <p>21 was -- what I was doing. I don't recall that.</p> <p>22 Q. Did you tell him during that call that</p> <p>23 you had signed a deal with New Japan?</p> <p>24 A. No.</p> <p>25 Q. Why not?</p>
<p style="text-align: right;">Page 255</p> <p>1 Brock Lesnar</p> <p>2 to tell them you weren't going to take the WWE</p> <p>3 offer?</p> <p>4 A. Yes.</p> <p>5 Q. And was that on August 2nd of 2005?</p> <p>6 A. I believe so.</p> <p>7 Q. So was that the first communication you</p> <p>8 had with Mr. Laurenitus following the meeting you</p> <p>9 had with him up at the WWE?</p> <p>10 A. No. Johnny called me. Johnny called me</p> <p>11 to ask if I had made a decision and I said, No,</p> <p>12 not yet, I'm still trying to decide.</p> <p>13 Q. Between the meeting you had at</p> <p>14 Mr. McMahon's office and August 2nd he called you</p> <p>15 and asked you that?</p> <p>16 A. Yeah.</p> <p>17 Q. Did you tell him you were dealing with</p> <p>18 New Japan?</p> <p>19 A. No.</p> <p>20 Q. When you called him to tell him that you</p> <p>21 weren't going to take the WWE offer, with as much</p> <p>22 detail as you can recall, what did you say to him?</p> <p>23 A. Well, I said, Hey, Johnny, how's it</p> <p>24 going? He said, Good, how are you? I said, Fine.</p> <p>25 I said -- I said, I have some bad news. He goes,</p>	<p style="text-align: right;">Page 257</p> <p>1 Brock Lesnar</p> <p>2 A. I didn't think they needed to know.</p> <p>3 Q. Didn't think they'd find out?</p> <p>4 A. What's the difference, you hear it from</p> <p>5 me or hear it from somebody else?</p> <p>6 Q. But was there a reason why you didn't</p> <p>7 just tell him, Look, I signed a deal with New</p> <p>8 Japan, that's what I'm going to do?</p> <p>9 A. I think David advised me not to say</p> <p>10 anything.</p> <p>11 Q. That would be David Olsen?</p> <p>12 A. Yeah.</p> <p>13 Q. Did he tell you why you shouldn't say</p> <p>14 anything?</p> <p>15 A. Because there was a lawsuit going on and</p> <p>16 didn't want to get into any, anything other than</p> <p>17 just telling them no.</p> <p>18 Q. After you concluded that conversation</p> <p>19 with the WWE with Mr. Laurenitus did you and</p> <p>20 Mr. Olsen try to conceal the fact that you had</p> <p>21 signed this deal with New Japan?</p> <p>22 A. I don't think so. What was there to</p> <p>23 conceal about it?</p> <p>24 Q. Following the entry of that -- I'll call</p> <p>25 it a letter agreement, if that's okay with you,</p>

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<p style="text-align: right;">Page 290</p> <p>2 WITNESS' CORRECTION</p> <p>3 SHEET</p> <p>4 PAGE LINE CORRECTION</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p style="text-align: center;">Brock Lesnar</p> <p>22</p> <p>23 Subscribed and sworn to before me</p> <p>24 this day of , 2005,</p> <p>25 , Notary Public.</p>	<p style="text-align: right;">Page 292</p> <p>2 INDEX:</p> <p>3 WITNESS EXAMINED BY PAGE</p> <p>4 Brock Lesnar Mr. McDevitt 5</p> <p>5 Mr. Centrella 277</p> <p>6 Mr. McDevitt 280</p> <p>7 Mr. Centrella 287</p> <p>8 Mr. McDevitt 287</p> <p>9</p> <p>10 DEFENDANT'S</p> <p>11 EXHIBIT DESCRIPTION PAGE</p> <p>12 1 Letter from Mr. Olsen to 28</p> <p>13 World Wrestling</p> <p>14 Entertainment dated 5/16/00</p> <p>15 2 Developmental contract 41</p> <p>16 3 Loan Out Agreement 52</p> <p>17 4 Settlement Agreement and 96</p> <p>18 General Release of All</p> <p>19 Claims</p> <p>20 5 Plaintiff's Privilege Log 98</p> <p>21 6 Document Bates stamped 135</p> <p>22 L0704 - L0705</p> <p>23 7 Document Bates stamped 159</p> <p>24 L0781</p> <p>25 8 Document Bates stamped 162</p> <p>L0706 - L0707</p> <p>9 Document Bates stamped 164</p> <p>L0777 - L0778</p> <p>10 Document Bates stamped 165</p> <p>L0776</p> <p>11 Document Bates stamped 184</p> <p>L0774 - L0775</p> <p>(Index continued)</p>
<p style="text-align: right;">Page 291</p> <p>2 STATE OF CONNECTICUT }</p> <p>3 ) SS:</p> <p>4 COUNTY OF )</p> <p>5 I, BROCK LESNAR, a Plaintiff herein, do</p> <p>6 hereby certify that having been first duly sworn to</p> <p>7 testify the truth, the whole truth, and nothing but</p> <p>8 the truth, I gave the above deposition, which was</p> <p>9 recorded stenographically and reduced to this</p> <p>10 original transcript.</p> <p>11 I FURTHER CERTIFY that the foregoing</p> <p>12 transcript of the said deposition is a true and</p> <p>13 correct transcript of the testimony given by me at</p> <p>14 the time and place specified hereinbefore.</p> <p>15 I FURTHER CERTIFY that any corrections or</p> <p>16 changes to this testimony have been made by me on</p> <p>17 the page provided for that purpose captioned</p> <p>18 "Witness' Correction Sheet", which has also been</p> <p>19 signed by me before a Notary Public.</p> <p>20</p> <p style="text-align: center;">Brock Lesnar</p> <p>21 Subscribed and sworn to before me</p> <p>22 this day of , 2005.</p> <p>23 , Notary Public.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 293</p> <p>2 DEFENDANT'S</p> <p>3 EXHIBIT DESCRIPTION PAGE</p> <p>4 12 Document Bates stamped 185</p> <p>5 L0769 - L0770</p> <p>6 13 Document Bates stamped 186</p> <p>7 L0771 - L0773</p> <p>8 14 Document Bates stamped 187</p> <p>9 L0763</p> <p>10 15 Document Bates stamped 189</p> <p>11 L0762</p> <p>12 16 Videotape 193</p> <p>13 17 One page document 199</p> <p>14 18 Document Bates stamped 203</p> <p>15 L0760 - L0761</p> <p>16 19 Document Bates stamped 210</p> <p>17 L0759</p> <p>18 20 Document Bates stamped 216</p> <p>19 L0336 - L0339</p> <p>20 21 Three-page document 222</p> <p>21 22 One-page document 227</p> <p>22 23 Booking Contract and Loan 232</p> <p>23 Out Agreement</p> <p>24 24 Document Bates stamped 241</p> <p>25 L0335</p> <p>26 Document Bates stamped 243</p> <p>L0333 - L0334</p> <p>27 Document Bates stamped 244</p> <p>L0329 - L0332</p> <p>28 Document Bates stamped 249</p> <p>L0326 - L0328</p> <p>(Index continued)</p>

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2	DEFENDANT'S		Page 294
3	EXHIBIT	DESCRIPTION	PAGE
4	28	E-mail from Mr. Centrella to Mr. McDevitt dated 8/2/05	254
5	29	Document Bates stamped L0791	258
6	30	Document Bates stamped L0799 - L0802	263
7	31	Contract	270
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2	CERTIFICATE	Page 295
3		
4	I, LORI DESKIN, a Notary Public within and	
5	for the State of Connecticut, do hereby certify:	
6	That BROCK LESNAR, the witness whose	
7	deposition is hereinbefore set forth, was duly sworn	
8	by me and that the within transcript is a true	
9	record of the testimony given by such witness.	
10	I further certify that I am not related to	
11	any of the parties to this action by blood or	
12	marriage and that I am in no way interested in the	
13	outcome of this matter.	
14		
15		
16	IN WITNESS WHEREOF, I have hereunto set my hand this	
17	2nd day of December, 2005.	
18		
19		
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22		
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24		
25		

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